

U.S. Customs and Border Protection | Office of Trade (OT)

# OT STRATEGY 2025

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U.S. Customs and  
Border Protection

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**CBP Office of Trade**  
Facilitate. Enforce. Protect.

# Foreword

Every day, the men and women who support the trade mission of U.S. Customs and Border Protection (CBP) facilitate the flow of legitimate trade, enforce U.S. trade laws and regulations to create a level playing field for American businesses, and protect the economy and the public from unsafe and unfair import practices.

Trade remains a vital lifeline to the American economy and people. Despite new challenges and new technologies that rapidly change how we conduct trade, our mission remains the same. We will continue to evolve and to adapt to the trade environment developing innovative solutions to meet the future of trade head-on.

It is an honor to serve and to lead the Office of Trade and to continue the journey we are taking together to create a world in which trade is streamlined, safe, and secure. I look forward to achieving the goals set out in this new OT Strategy 2025.



**Brenda B. Smith**

*Executive Assistant Commissioner*  
U.S. Customs and Border Protection  
Office of Trade



# OT Strategy 2025 Executive Summary

## A Strategy to Facilitate Trade, Enforce U.S. Laws, and Protect the American Economy and Consumers

U.S. Customs and Border Protection (CBP) collects the second largest revenue amount for the U.S. government, and the Office of Trade (OT) is the architect of the most robust customs system in the world. We facilitate legitimate trade, enforce U.S. laws, and protect the American economy as well as consumer health and safety. Collaborating with industry and government partners, we create a fair, competitive, and safe trade environment, and we enforce U.S. trade laws to protect national economic security. Our expertise in the trade community allows us to lead the development of streamlined and efficient processes that provide certainty for legitimate importers, while combating transnational crime.

In a global environment of increased international trade flows, especially shifting patterns related to e-commerce, and increased public awareness of the importance and impacts of national trade policies, OT's mission is becoming ever more important and visible. The nation and our stakeholders in the private and public sectors need a champion to lead the smooth implementation of trade policy initiatives, an advocate to promote and address the needs of legitimate businesses, a guardian against malicious or unsafe trade practices and products, and a partner in broader efforts to secure and manage the nation's borders. CBP's Enduring Priority, "Facilitate Lawful Trade and Protect Revenue" served as a guide in the development of the updated OT Strategy 2025.

This OT Strategy 2025 lays out OT's vision and direction to accomplish its challenging and diverse missions and to address the needs of its critical internal and external stakeholders. It presents a bold vision to improve the experience of the legitimate trade community while improving CBP's ability to identify and interdict illegitimate and unsafe goods.

Through this Strategy, OT embraces the challenge of e-commerce and how the explosion in the number of small direct-to-consumer imports is fundamentally changing the game for trade facilitation and enforcement. Additionally, the Strategy emphasizes a renewed commitment to our workforce to provide the training, opportunities, and work environment they need to effectively meet the needs of the stakeholders they support.

This Strategy identifies five primary goals:

1. **Efficient Trade Facilitation:** Streamline administrative processes to increase efficiency, lower cost, and reduce processing times to ensure compliance with trade laws and Administration policy goals.
2. **Effective Risk-Based Enforcement:** Support a level trade playing field through consequence delivery, risk-based analysis, and an intelligence-driven enforcement approach.
3. **Secure and Sustainable E-commerce:** Create new paradigm for trade facilitation and enforcement in light of unprecedented growth in e-commerce.
4. **Trade Operational Expertise:** Strengthen OT's presence among national economic and trade policy makers and industry stakeholders.
5. **Workforce Skills and Capabilities:** Prepare the workforce with new skills and capabilities while expanding sources of talent for new hires.

We are excited to embark on this journey, working closely with our internal and external partners and stakeholders to protect our country's economic interests and the public's safety while continuously improving the fundamental flow of goods and services.



# Strategic Context

## Trade Mission

CBP is responsible for making sure that cross-border trade complies with U.S. trade laws and promotes fair, secure, and safe competition. CBP works to enable legitimate trade, contribute to American economic prosperity, and protect against risks to public health and safety. CBP administers U.S. trade laws that:

- Facilitate efficient trade for U.S. businesses and consumers
- Protect consumers from unsafe products and materials
- Protect U.S. businesses from unfair trade practices
- Generate the second largest revenue stream for the U.S. government

The Office of Trade leads the trade mission on behalf of CBP by managing national programs that facilitate trillions of dollars of trade and translate the regulations of 49 partner government agencies into enforceable trade guidance, while facilitating compliance. OT coordinates with trade industry and incorporates feedback on key trade issues, conducts audits and other trade-related enforcement activities, and supports field-based interventions conducted at ports of entry in the U.S. and overseas.

## Changing Landscape

Trade is vital to U.S. economic growth and security. Over the past decade, global trade has become increasingly complex as trade volumes continue to grow and the number of participants and individual transactions has grown exponentially (largely due to e-commerce). As the landscape has shifted, OT has developed initiatives to modernize processes, protect intellectual property rights, and improve engagement with the trade community.

OT is at the nexus for trade engagements, collecting and analyzing data to make

intelligence-driven enforcement decisions, monitoring and tracking Priority Trade Issues (PTIs), and employing and developing a world-class workforce that delivers its mission.

PTIs continue to represent high-risk areas that can harm the U.S. economy, threaten the health and safety of the American people, or result in revenue loss. However, new risks and trends that drive the need for change have emerged. E-commerce has become efficient, cost-effective, and a dominant force in daily U.S. trade. Online marketplaces and small packages imported under the *de minimis* threshold provide little visibility regarding package content and origin to CBP and OT, complicating trade enforcement and security screening.

OT Strategy 2020 created a path forward to enhance the agency's security posture, modernize import/export processes, improve trade intelligence, and maximize efficiencies. OT Strategy 2025 builds and adapts to new internal and external influences with actionable strategic goals and a framework to improve the overall trade mission.



# Vision and Guiding Principles

## A Bold Vision of Collaboration to Achieve Shared Goals

International trade is a critical component of the nation's economy. Beyond simply providing goods that our domestic industry and consumers need and want, trade stimulates the economy. Each \$1 increase in international trade provides approximately \$2 increase in gross domestic product (GDP). This GDP increase reflects new jobs, improved economic security for families, and new opportunities for the country.

Extensive trade comes with challenges. Foreign competitors may unfairly target U.S. economic interests, and importers may knowingly or unknowingly import goods that are not safe or not what they are purported to be. With the dramatic increase in direct-to-consumer shipments, the challenges of enforcing policies and protecting consumers while allowing rapid delivery of goods increase.

Through close, ongoing collaboration with the trade, OT aims to build a system that allows innovation to flourish and to modernize across policy, regulatory, and statutory areas that will position CBP for the future of trade while creating a process that is more streamlined, secure, collaborative, and digital from end-to-end.

OT envisions a world where data-driven decisions replace outdated methods. To do that, we need new technologies, new ways of sharing data within and outside the government, and the ability to take enforcement actions against new and emerging threats.

In this vision:

- Importers effortlessly convey the information most useful to CBP to make enforcement decisions, facilitated by improved methods to interact with, and obtain guidance from CBP.
- Enforcement activities focus on highest-risk shipments, increasing CBP productivity and the overall speed of clearance, while also supporting overall CBP security mission needs.
- Consumers trust that e-commerce shipments (and all shipments) are safe and genuine.
- Trade policy decisions are informed by operational insight and experience, surgically targeting the most efficient action to achieve the policy goal.

To achieve this vision, the following guiding principles are an essential part of implementing each goal:

- Smart use of data and analytics to assess trade compliance risks as a foundation for PTI and industry sector plans;
- A commitment to modernization and adaptability to improve trade processes and safeguard the U.S. economy;
- Continuous improvements to OT's outreach to government and private sector stakeholders to facilitate understanding, decision-making, and efficiency; and
- A commitment to our workforce, recognizing that their skills and dedication are the foundation of all activities in this strategy.



## GOAL 1

# Efficient Trade Facilitation

Streamline administrative processes to increase efficiency, lower cost, and reduce processing times to ensure compliance with trade laws and Administration policy goals

## Vision

**Trading is streamlined and intuitive – the burdensome processes of the past are gone. Integrated data platforms, new and updated trade agreements and policies, and an account-based system pave the way for the future.**

## Objectives

- Adopt digital and technological innovations to reduce trade compliance burden
- Improve customer experience across trade interactions
- Simplify trade interactions through integrated account management and billing
- Pursue the 21st Century Customs Framework to modernize and enhance trade processes while protecting revenue and safeguarding the economy

## Context

OT applies world-class expertise to design trade processes and policies that minimize cost and provide certainty, transparency, and predictability to members of the trade community. OT achieves this through the issuance of CBP regulations, legally binding rulings and decisions, informed compliance publications, and structured programs for external training and outreach on international trade laws and CBP regulations. Both CBP and the trade community benefit when clear and accurate data speeds facilitation of legitimate trade while enabling CBP to focus on unknown or risky importers. OT applies expertise, technology, and automation to create streamlined and efficient processes to facilitate the global exchange of safe and legitimate goods.

## Desired Outcomes

- Decline in administrative costs
- Increased integration with private sector digital supply chains
- Increased transparency and data sharing
- Increased compliance and security

## Key Initiatives

- Automated Commercial Environment (ACE) “Single Window” enhancements
- Foster the adoption of CBP IT digital enterprises and technological innovations
- Deploy robotic process automation

The current system, while increasingly automated, still depends on transaction-based processing and some redundant data entries, which creates extra work for importers and impairs the enterprise-wide view of trade that CBP needs.





## GOAL 2

# Effective Risk-Based Enforcement

Support a level trade playing field through consequence delivery, risk-based analysis, and an intelligence-driven enforcement approach

## Vision

**Smart use of data, consequence delivery, and a new risk framework leads to early identification, deterrence, and disruptions of potential trade violations without interfering with legitimate trade.**

## Objectives

- Rigorously assess trade compliance risks through analytics and intelligence as a foundation for PTI and industry sector plans
- Build analytical and data management capabilities necessary to identify highest risk transactions and entities
- Deploy tailored interventions to address identified risks, and limit interventions against compliant trade activity
- Implement risk-based bonding to reduce USG financial exposure



## Context

OT enforces trade laws by targeting and penalizing lawbreakers through monetary penalties and legal action. Unfair, unsafe, or illicit trade practice is not tolerated within U.S. supply chains. OT works closely with the Office of Field Operations (OFO) and supports national enforcement responses through effective targeting of goods crossing the border as well as strict, swift punitive actions against companies participating in predatory trade practices.

Through coordination with international partners and other U.S. government agencies, OT directs the enforcement of intellectual property rights (IPR), the identification of risks to detect and prevent the importation of contaminated agricultural or food products, and the enforcement of free trade agreement eligibility.

OT uses a risk-based audit program supporting the transition to a paperless, digital environment, which will reduce the churn and create less administrative work for our stakeholders.

## Desired Outcomes

- Every shipment has the data needed for screening and an evaluated risk level; information aggregated for real-time account risk profiles
- CBP has a spectrum of interventions tailored to varying risk profiles
- Predictable trade violations are identified prior to shipment; interventions are executed beyond U.S. borders when warranted
- CBP and commercial information is available to CBP trade personnel for best risk-based decision-making

## Key Initiatives

- Consequence delivery
- Intelligent enforcement to update targeting systems and enhanced bonding
- Advanced Trade Analytics Platform (ATAP) development and improvement
- Implement “federated view” to ensure CBP has an integrated awareness of activities at all levels

The audit program is also used to respond to allegations of commercial fraud and to conduct corporate reviews of internal controls to ensure importers comply with trade laws and regulations.





## GOAL 3

# Innovative and Sustainable E-commerce

Create new paradigm for trade facilitation and enforcement in light of unprecedented growth in e-commerce

## Vision

**CBP leads the development of new global models for e-commerce trade enforcement to collect and protect revenue, enforce trade remedies, generate economic prosperity, and instill confidence that the products consumers purchase online are safe and genuine.**

## Objectives

- Create new or tailor existing targeting and enforcement actions to low-value, high-volume shipments
- Improve data sharing and data reporting requirements from non-traditional parties to effectively vet and target noncompliance
- Build upon existing networks to enhance partnerships with domestic and international stakeholders that address small parcel shipments

## Context

CBP faces three disruptive trends as it seeks to balance its mission to facilitate trade with the enforcement of regulations that protect American consumers and the economy. A sharp increase in e-commerce from a rise in online marketplaces allows non-U.S.-based parties to more easily sell and ship small packages to U.S. consumers. The increase in the *de minimis* threshold in 2016 also increased the value and number of shipments that are not subject to full ACE reporting. Finally, postal agreements reduce the cost of postal (vs. express) shipping, driving the small package volume to postal services, which tend to provide less shipping information than express carriers. These trends have led to the dramatic increase in low-value shipments with limited customs visibility.

## Desired Outcomes

- OT regularly collects advance data from new supply chain parties and analyzes information to enhance enforcement efforts
- OT applies e-commerce strategy to current trade models and integrates it into trade legislation

## Key Initiatives

- Implement effective consequence delivery based on the unique provisions for low value shipments
- Develop e-commerce standards and best practices and educate community
- Expand Sec. 321 Data pilot
- Streamline IPR enforcement actions to adapt to new e-commerce risks

In light of these changes, the Office of Trade must focus on enhancing the capabilities needed to effectively manage e-commerce and will pursue the OT Strategy 2025 objectives to augment [CBP's E-Commerce Strategy](#), which is located on [CBP.gov](#).



## GOAL 4

# Trade Operational Expertise

Strengthen OT's presence among national economic and trade policy makers and industry stakeholders to leverage industry practices, legal requirements, and government capabilities

## Vision

**OT's knowledge of supply chains informs decision-making at the highest levels.**

## Objectives

- Proactively engage economic and trade policy stakeholders and influencers on topics at the intersection of trade policy and operational implementation
- Incorporate analytical insights and capabilities to provide an assessment of trade policy options

## Context

OT serves as CBP's primary liaison to the executive and legislative branches on trade-related issues. OT's expertise in the trade community allows OT to

lead the development of streamlined and efficient processes that provide certainty for legitimate importers, while combating transnational crime. OT brings unique insight from managing nationwide programs that facilitate trillions of dollars of in trade, conducting audits and other trade-related enforcement activities, and translating the regulations of 49 partner government agencies into enforceable trade guidance, while facilitating stakeholder compliance.

This operational expertise is coupled with forward-looking views that provide critical information to help policy makers in CBP, the Administration, and Congress as they make decisions to improve cross-border trade.

OT is committed to doing more to enable this expertise to support effective policy decision-making.

## Desired Outcomes

- OT is consistently involved in priority trade conversations with executive, legislative, and industry policy leaders

## Key Initiatives

- Lead the shaping of global trade standards
- Expand strategic partnerships
- Communication, engagement, and outreach with intergovernmental partners and trade industry partners



## GOAL 5

# Workforce Skills and Capabilities

Prepare the trade workforce with new skills and capabilities while expanding sources of talent for new hires

## Vision

**OT personnel have the technological and analytical skills and support they need to accomplish our mission. Employees operate in a collaborative, innovative, and strategic environment. OT attracts and retains the highest caliber trade-professionals.**

## Objectives

- Formalize progression for career paths
- Expand expertise development and training programs
- Foster a flexible work-life balance
- Expand sources of talent for new hires and use all hiring authorities
- Grow data analytics skills and capabilities to adapt to the changing trade environment

## Context

The OT workforce consists of people with diverse and specialized skills, often representing unique application of expertise in law, auditing, risk analysis, and communications. OT must strive to maintain and develop the workforce needed to accomplish the Office's critical role in protecting the integrity of our trade laws and markets, collecting over \$80 billion in trade-related revenue, and improving consumer safety.

OT personnel currently represent less than two percent of the total CBP workforce. However, their impacts and contributions are far reaching as experts in the legal, financial, procedural, and policy aspects of trade. OT must continue to devote the time and resources required to continue to develop such expertise.

## Desired Outcomes

- OT critical roles are fully staffed, well trained, and developed through well-defined career paths
- Human capital strategy established, linking needed employee capabilities with integrated recruiting and retention plan
- OT is ranked in the top quartile of places to work in the federal government
- Trade retention exceeds federal government average across tenure levels

## Key Initiatives

- Strategic Staffing Pillar (recruitment, direct hire, relocation, incentives)
- Mission support system and programs for improved recruitment and applicant processing
- Build Trade and Cargo Academy facility; curriculum redesign, establishment of knowledge management approach





# Measuring and Achieving Success

## Measuring Success

In order to achieve the vision and outcomes in this strategy, we established key performance measures that we will track and monitor to verify progress and identify challenges.

Goals and strategic initiatives will be closely tied to and operationalized by the relevant Office of Trade program areas to maintain accountability and consistency.

OT will continue to work with our partners to collect, analyze, and track data to measure progress on **facilitation and enforcement** efforts.

We will measure our engagement with stakeholders and hold ourselves accountable for informing decision-makers across the public and private sectors on trade-related matters.

OT will continuously monitor and assess our workforce capabilities and gaps as we look to **build and strengthen our people and organization**.

Additionally, OT will monitor e-commerce initiatives and develop facilitation and enforcement measures.

To ensure the strategy remains a focal point throughout its lifetime, it will be included in all annual planning guidance. OT leadership will stand ready to help and support where necessary.

The Office of Trade is the architect of the most robust customs system in the world. We must continue to adapt and evolve in a changing trade environment to deliver on our mission. Implementing this strategy is a collaborative effort that will accomplish our vision to make trade streamlined, safe, and secure.



## CBP Office of Trade

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